Section 1. Registration Information

Source Identification

Facility Name:	Tanimura and Antle Fresh Foods Inc.
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Regulated substance present above TQ in new (or previously not covered) process (40 CFR 68.190(b)(4))
Description:	
Receipt Date:	25-Jun-2010
Postmark Date:	23-Jun-2010
Next Due Date:	23-Jun-2015
Completeness Check Date:	28-Jun-2010
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0010 8279
Other EPA Systems Facility ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	6435 E. Gila Ridge Road
Street 2:	
City:	Yuma
State:	ARIZONA
ZIP:	85365
ZIP4:	
County:	YUMA

Facility Latitude and Longitude

Latitude (decimal):	32.675833
Longitude (decimal):	-114.522222
Lat/Long Method:	Global Positioning System (GPS) Carrier Phase Static Relative Positioning Technique
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	6
Horizontal Reference Datum Name:	North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name:	Tanimura and Antle
Operator Phone:	(831) 455-2950

Mailing Address

Operator Street 1:	6435 E. Gila Ridge Road
Operator Street 2:	
Operator City:	Yuma
Operator State:	ARIZONA
Operator ZIP:	85365
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Frank Garcia
RMP Title of Person or Position:	General Manager
RMP E-mail Address:	

Emergency Contact

Emergency Contact Name:	Frank Garcia
Emergency Contact Title:	General Manager
Emergency Contact Phone:	(831) 455-3992
Emergency Contact 24-Hour Phone:	(831) 595-1327
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	frank@taproduce.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Yuma County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	75
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes

CAA Title V:
Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	06-Jun-2008
Last Safety Inspection Performed By an External Agency:	Fire Department

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Michael Schreck
Preparer Phone:	(831) 210-5735
Preparer Street 1:	18700 Moro Road
Preparer Street 2:	
Preparer City:	Salinas
Preparer State:	CALIFORNIA
Preparer ZIP:	93907
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	81811
Description:	Portable T-4
Process Chemical ID:	108790
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	4449
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81812
Description:	Portable T-5
Process Chemical ID:	108791
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	4655
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81815
Description:	Portable T-55
Process Chemical ID:	108794
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	4344
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81806
Description:	East Cooler
Process Chemical ID:	108785
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	17000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81808
Description:	Portable IG-12
Process Chemical ID:	108787
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	1810
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81814
Description:	Portable T-22
Process Chemical ID:	108793
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)

CAS Number:	7664-41-7
Quantity (lbs):	2904
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81816
Description:	West Cooler
Process Chemical ID:	108795
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	14804
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81810
Description:	Portable T-52
Process Chemical ID:	108789
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	4708
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81807
Description:	Portable IG-11
Process Chemical ID:	108786
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	1809
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81809
Description:	Portable IG-13
Process Chemical ID:	108788
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	1944
CBI Claimed:	
Flammable/Toxic:	Toxic

Process ID:	81813
Description:	Portable T-8
Process Chemical ID:	108792
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	5338
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	81806
Process NAICS ID:	83792
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81807
Process NAICS ID:	83793
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81808
Process NAICS ID:	83794
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81809
Process NAICS ID:	83795
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81810
Process NAICS ID:	83796
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81811
Process NAICS ID:	83797
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81812

Process NAICS ID:	83798
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81813
Process NAICS ID:	83799
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81814
Process NAICS ID:	83800
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81815
Process NAICS ID:	83801
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Process ID:	81816
Process NAICS ID:	83802
Program Level:	Program Level 3 process
NAICS Code:	115114
NAICS Description:	Postharvest Crop Activities (except Cotton Ginning)

Section 2. Toxics: Worst Case

Toxic Worst ID: 53489

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	Emergency Response

Section 3. Toxics: Alternative Release

Toxic Alter ID: 62946

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	Yes
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	Yes
Other Type:	Ammonia Detection

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

The processes are closed loop refrigeration systems.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	70170
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7
Prevention Program Level 3 ID:	48174
NAICS Code:	115114

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	06-Jun-2008

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	18-May-2004

The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	15-May-2006

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	Yes
Floods (Flood Plain):	

Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	Personal Monitors

Changes Since Last PHA Update

Reduction in Chemical Inventory:	Yes
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	Yes

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	06-Jun-2008

Training

Training Revision Date (The date of the most recent review or revision of training programs):	06-Jun-2008

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	06-Jun-2008
Equipment Inspection Date (The date of the most recent equipment inspection or test):	14-Oct-2006
Equipment Tested (Equipment most recently inspected or tested):	All processes

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	06-Jun-2008

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	06-Jun-2008

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	06-Jun-2008

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	06-Jun-2008

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	06-Jun-2008

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Yuma County LEPC
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(928) 317-4550

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	
RCRA Regulations at CFR 264, 265, and 279.52:	
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	Californa (Title19) CalARP;29CFR 1910.120. (q) First Responder Training

Executive Summary

SCOPE
The EPA RMP regulation requires that an Executive Summary be provided as part of the registration submitted to the EPA. The following areas are addressed in this summary:
¿ Accidental Release Prevention and Emergency Response Policies
¿ Stationary Source Activities and Regulated Substances Handled
¿ Worst-Case and Alternative-Case Release Scenarios
¿ Prevention Program
¿ Five-Year Accident History
¿ Emergency Response Program
¿ Planned Changes to Improve Safety

ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES
Tanimura and Antle is committed to complying with all of the regulatory requirements of the EPA Risk Management Program. Tanimura and Antle has developed their Risk Management Plan / Process Safety Management (RMP/PSM) Manuals to document policies and address the implementation of these regulations. The PSM sections pertain to the prevention of accidental releases and include the Process Hazard Analysis study and procedures for operating, training, maintenance, emergency response, and others. The RMP sections pertain to management systems and include the Hazard Assessment (Offsite Consequence Analysis) Report.

Federal regulations require reporting when there is a release of ammonia exceeding 100 pounds in 24 hours.

State regulations require reporting when there is an accidental release of ammonia or a threat of accidental release of ammonia. Tanimura and Antle interprets this regulation at any release that poses a threat of injury above and beyond minor irritation to anyone.

All releases and near misses are to be recorded using the incident investigation forms. All releases are to be monitored and all readings recorded. All releases and near misses are to be reviewed to develop procedures that may prevent future incidents.

Any release of more than 25 ppm may result in immediately shutting down the ammonia system depending on the location of the release. The Operations Manager and the Refrigeration Manager are to be called if not on site for support. Releases less than 25 PPM shall result in immediately calling the Operations Manager and the Refrigeration Manager, if not on site, for instructions.

There are additional full time supervisory and operational employees at this facility in addition to the Maintenance Supervisor that have been trained to conduct visual and audible inspections of the ammonia system on a regular basis. They are instructed to report any condition that could result in an ammonia release immediately. An example would be excessive rust on piping or tanks. This team activity is the core of Tanimura and Antle's prevention program.

STATIONARY SOURCE ACTIVITIES AND REGULATED SUBSTANCES HANDLED
The Tanimura and Antle facility provides product cooling, and short-term storage for fresh vegetables.

The facilities are located in an industrial area of Yuma county on a contiguous property. Ammonia is used as the refrigerant in the two Main Plant Refrigeration Systems, Ice Generating Refrigeration Systems and Vacuum Cooling which includes interconnected portable equipment. The total ammonia inventory in each of the two Main Plant systems exceed the Federal and State thresholds.

In addition to the Main Plant Systems several smaller portable systems less than 10,000 lbs are located on the property. Other than this paragraph, these systems are addressed in the EPA RMP submission as additional processs.

The refrigeration systems are direct, mechanical refrigeration systems. The original facilities were built prior to 1990. The ammonia equipment is located outside or in the Refrigerated Rooms.

A portion of the ammonia equipment is portable and can be moved on and off site if required. Some interconnecting piping between the portable components and the Main Plants are permanently mounted. Some are removable.

HAZARD ASSESSMENT
The regulation requires that the Worst-Case Release Scenario use the ammonia quantity in the largest vessel or pipe.

NOTE: It is important to consider that the Worst-Case Scenario is extremely unlikely to occur since this scenario does not consider any safety features of the system - in either design or operation. In addition the Main Plant Systems are separated by walls and distance. Furthermore as the refrigerant escapes pressure will decrease reducing the release rate. The scenario parameters are established by the regulation to provide uniformity for dialog between the industry, community, and regulatory agencies.

The regulation allows the facility to select the Alternate-Case Scenario.

PREVENTION PROGRAM
Tanimura and Antle's Prevention Program is described in the RMP/PSM Manual. The RMP Prevention Program is equivalent to OSHA¿s Process Safety Management Program (PSM). The Prevention Program implemented by Tanimura and Antle is essential to help prevent or minimize the effects if a release occurs.

Key objectives of Tanimura and Antle's Prevention Program are briefly described below:

1) Maintain current and complete refrigeration system technical information. (Addressed under the Process Safety Information Element)

2) Provide thorough team evaluation of the refrigeration system. The evaluation considers a number of potential problems including: mechanical problems, human errors, and external events (e.g., earthquakes). All safety recommendations developed by the team are reviewed and addressed by Tanimura and Antle . (Addressed under Process Hazard Analysis and Mechanical Integrity Elements).

3) Written procedures and policies that establish how the refrigeration system should be operated and maintained and how to investigate accidental releases. (Addressed under Operating Procedures, Mechanical Integrity, and Incident Investigation Elements.)

4) Certification of refrigeration operators to safely operate the refrigeration system. Tanimura and Antle certifies operators following completion of operator training and Tanimura and Antle's confirmation of the operator's ability apply what they have learned. (Addressed under Training Element.)

5) Employee involvement in the Prevention Program. This is addressed on two levels. First, refrigeration equipment operators participate in the planning and evaluation of the Prevention Programs (e.g., Process Hazard Analysis study team, writing and/or reviewing operating procedures, Incident Investigation team, etc.). This involvement encourages ownership of the Prevention Program and positively affects the operators' day-to-day activities.
Second, all Tanimura and Antle employees (direct hires and contract) at this facility receive ammonia awareness training. Additionally, they have access to the RMP/PSM information. These activities improve the overall safety of the employees. (Both levels are addressed under the Employee Participation Element)

6) Implementation of additional measures when changes are planned (procedural or mechanical). These measures begin before any changes are made and may include a Process Hazard Analysis, operator training, and Process Safety Information updates plus other measures required by Tanimura and Antle's Management of Change Procedure.

If a mechanical change is required and for maintenance contracts, Tanimura and Antle has a procedure for selecting a contractor based on the company's experience and safety history. Additionally, if welding, grinding, or other "Hot Work" occurs close to the refrigeration system, a Tanimura and Antle Hot Work permit is required. The purpose of the permit and the associated Hot Work procedure is to minimize the possibility of a fire.

Following completion of a mechanical change, a pre-startup safety review is required before the system can be started. (These areas are addressed under Management of Change, Contractor Qualifications, Hot Work Permit, and Pre-Start-up Safety Review Elements.)

7) Verification of Tanimura and Antle's compliance with the RMP/PSM program. This self-audit process is an important tool to confirm whether each of the elements in the Prevention Program (and the Risk Management Program) has been implemented and properly documented by Tanimura and Antle personnel. Tanimura and Antle has established a Management System procedure to address any shortcomings, which the audit may find. (Addressed under Compliance Audit chapter.)

8) Minimize employee injury and illness. (Addressed under Tanimura and Antle's Injury and Illness Prevention Program)

FIVE YEAR ACCIDENT HISTORY
There were no reportable ammonia releases at this facility during the last 5 years that meet the standard of State or Federal regulations.

EMERGENCY RESPONSE PROGRAM
This facility has trained personnel to implement the Emergency Response Plan developed for this facility. Responders are not trained to enter an IDLH condition. Responders are trained to the (300 PPM) Air Purifying Respirator level. Responders will assist outside agencies during larger releases.

Detailed plans (emergency action plans) have been developed to assist responding facility personnel. All areas (zones) inside the building can be brought under control within 20 minutes of any ammonia emergency or breakdown if personnel are on site. Small releases can be brought under control immediately.

The emergency release response plan for all releases is to gain access to the shut down valves and switches for the system with the release. If the system shut down areas are within the ammonia release area the entire ammonia system may be shut down if appropriate. The appropriate shut down switches are identified.

The Federal and California Emergency Planning Regulations considered in this program include:
EPA¿s Risk Management Plan
OSHA¿s Emergency Action Plan
OSHA¿s Process Safety Standard
EPA¿s Emergency Planning and Community Right to Know
Contingency Plan

PLANNED CHANGES TO IMPROVE SAFETY
Employees, community safety, the environment and product care are primary concerns at this facility. The prevention program has been updated as a result of recent addition/changes of equipment. A PHA study was conducted at Tanimura and Antle and the study team made recommendations for additional safety.

The following are additional examples of improvements to reduce accidental releases either in process or planned for at this time.

Additional Operating Procedures for all systems.
Continue pipe marking, tagging and painting of all systems
Install new ammonia detection
Train additional Responders